

## REMARKS

In the application claims 1-14 remain pending. Claims 12-14 have been added by amendment and find their support in the specification, figures, and claims as originally filed. No new matter has been added. Pending claims 1-3, 5, 6, 8, 10 and 11 presently stand rejected. The reconsideration of the rejection of the claims is, however, respectfully requested.

The pending claims are directed to a system and a method for controlling the operation of a home appliance. As set forth in independent claim 1, activation of a key on a relay unit is used to simulate activation of a key of a remote control to thereby cause the remote control to transmit the same command code(s) from a command code library stored in a memory of the remote control that have been associated with the key of the remote control key as if the key of the remote control were activated directly. As set forth in independent claim 10, the same command code(s) from a command code library stored in a memory of a device that have been associated with a key of the device are transmitted to a home appliance if either the key of the device is activated directly or if the device receives a signal transmission which identifies the key of the device.

It is respectfully submitted that the combination of Herder (U.S. Patent No. 5,986,644) and Huang (U.S. Patent No. 6,640,144) fail to disclose, teach, or suggest, whether considered alone or in combination, each and every element set forth in either independent claims 1 and 10. For this reason it is respectfully submitted that the rejection of the claims must be withdrawn.

Considering first Herder, Herder discloses a system in which a PC (30) may be controlled using a primary controller (100) and/or a remote controller (50). To this end, the remote controller (50) of Herder transmits its own command signal to the primary controller (100) and the primary controller (100) functions to retransmit the information contained within the command signal received from the remote controller (50) to the PC (30):

As also described in more detail below, IR communication section 104 receives IR signal 60 from remote controller 50, encodes the information in the IR signal into an electronic signal and provides such signal via control section 102 to electronic apparatus 30.

(See Col. 5, lines 7-12).

When the information contained within the command signal is relative cursor location information, the microcontroller of the primary controller (100) merely converts the cursor location, select commands, and other information contained within the command signal into the appropriate format for the device driver used in PC (30). When the information contained within the command signal is absolute cursor location information, the primary controller (100) may be programmed to first convert such information into relative cursor location information, using a look-up table, before converting the cursor location, select commands, and other information contained within the command signal into the appropriate format for the device driver used in the PC. (See Col. 10, lines 21-44 and Col. 9, lines 8-29).

Thus, based upon a full and fair consideration of the system disclosed within Herder, it is respectfully submitted that the system of Herder does not disclose, teach, or suggest the claimed system in which a relay unit has a button corresponding to a key of a keypad wherein activation of the button functions to simulate activation of the key of the keypad to thereby cause the transmitter to transmit to the home appliance *the same command code from the command code library* that is associated with the key of the keypad as if the key of the keypad were activated directly. Similarly, it is respectfully submitted that Herder fails to disclose, teach, or suggest the claimed method in which *the same command code from a command code library* that is associated with a key of a keypad is transmitted if either the key is activated or if a signal transmission that identifies the key is received. Rather, as discussed above, Herder discloses a system in which the remote controller (50) transmits a command signal (as opposed to a signal

that identifies a key) and the primary controller (100) functions as nothing more than a pass-through device that converts *the very same data contained within the command signal received from the remote controller (50)* into a format recognized by a device driver of the PC (30) (as opposed to transmitting to the PC a command from a command library stored within a memory of the primary control which has been associated with a key of the primary controller).

Therefore, since Herder cannot be said to disclose, teach, or suggest the basic elements of the invention set forth in the claims, it is respectfully submitted that the combination of Herder and Huang cannot be said to establish a *prima facie* case of obviousness. For this reason it is submitted that the rejection of the claims must be withdrawn.

Considering now Huang, while Huang may disclose a controlling device having means to select executable instructions from a library of executable instructions for use in commanding operations of appliances, it is respectfully submitted that one of ordinary skill in the art would not be motivated to use the teachings of Huang to modify the system of Herder in the manner set forth in the Office Action. In this regard, the look-up table of Herder is provided to convert absolute cursor location information into relative cursor location information. Accordingly, were one to remove the look-up table of Herder in favor of the command code library of Huang, the system of Herder would no longer be able to function to convert absolute cursor location information into relative cursor location information. Since it is impermissible to propose a modification that would render the prior art invention being modified unsatisfactory for its intended purpose, it is respectfully submitted that the rejection of the claims must be withdrawn.

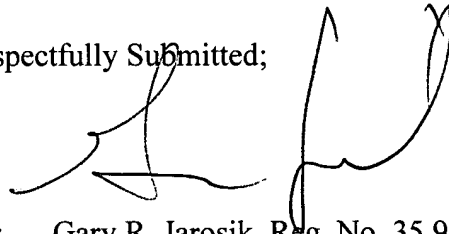
#### CONCLUSION

It is respectfully submitted that the application is in good and proper form for allowance. Such action of the part of the Examiner is respectfully requested. Should it be determined,

however, that a telephone conference would expedite the prosecution of the subject application, the Examiner is respectfully requested to contact the attorney undersigned.

The Commissioner is authorized to charge any fee deficiency or credit overpayment to deposit account 50-2428 in the name of Greenberg Traurig.

Respectfully Submitted;

A handwritten signature in black ink, appearing to be 'G. Jarosik', written over the words 'Respectfully Submitted;'. The signature is fluid and cursive.

Date: May 10, 2005

By: Gary R. Jarosik, Reg. No. 35,906  
Greenberg Traurig, LLP  
77 West Wacker Drive, Suite 2500  
Chicago, Illinois 60601  
(312) 456-8449